

PSJ3

Exhibit 541

Agenda

- Know Your Customer (KYC)
- Electronic Monitoring
- Early Dialogue
- Threshold Events
- Review Process

Know Your Customer (KYC)

- **Know Your Customer (KYC)** – Process by which to better know our customers
- Collection and analysis of store specific information. This information allows Cardinal Health to complete an appropriate assessment (and validation) of relevant facts to ensure that buying patterns are appropriately aligned with a customer's business model.
 - KYC information to provide for each store on a quarterly* basis includes:
 - 24 hour store
 - Prescriptions, on average, filled per day
 - Automated filling and/or dispensing machines
 - Percentage of payment methods
 - If the store services hospice, long-term care facilities, pain management, and/or weight management clinics
 - Percentage of prescriptions filled for controlled substances
 - Monthly dispense utilization

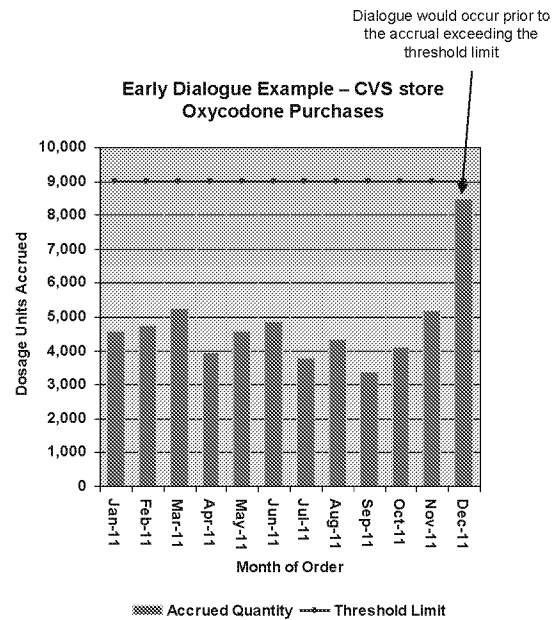
* Providing KYC information in advance would reduce the information needed at the time of a threshold event and expedite the review process.

Threshold Limits

- **Electronic Monitoring** - Systemic process prior to order fulfillment to identify orders of unusual size, frequency, and/or pattern
 - Electronic Monitoring program includes:
 - Monthly accrual of dosage units ordered by drug families
 - Threshold limits or quantity caps to hold and review orders
 - Accrual completed by DEA number of CVS store
- **Statistical approach used to establish threshold limits**
 - Usual order pattern is determined for CVS stores collectively
 - Standard deviation is measured and used to formulate threshold limit
 - Additional data about stores improves methodology and removes inaccurate generalizations; facilitates establishing more accurate threshold limits

Early Dialogue

- Identification of a store when their electronic monitoring accrual approaches 75% of the corresponding threshold limit
 - Prior to orders being held
- Cardinal Health would proactively notify CVS (Karen Gibbs) that the store is approaching their threshold limit
- CVS would provide information specific to the store's buying pattern
 - What is changing at the store (provide detailed explanation)?
- Potentially avoid interruption to legitimate supply



Threshold Event

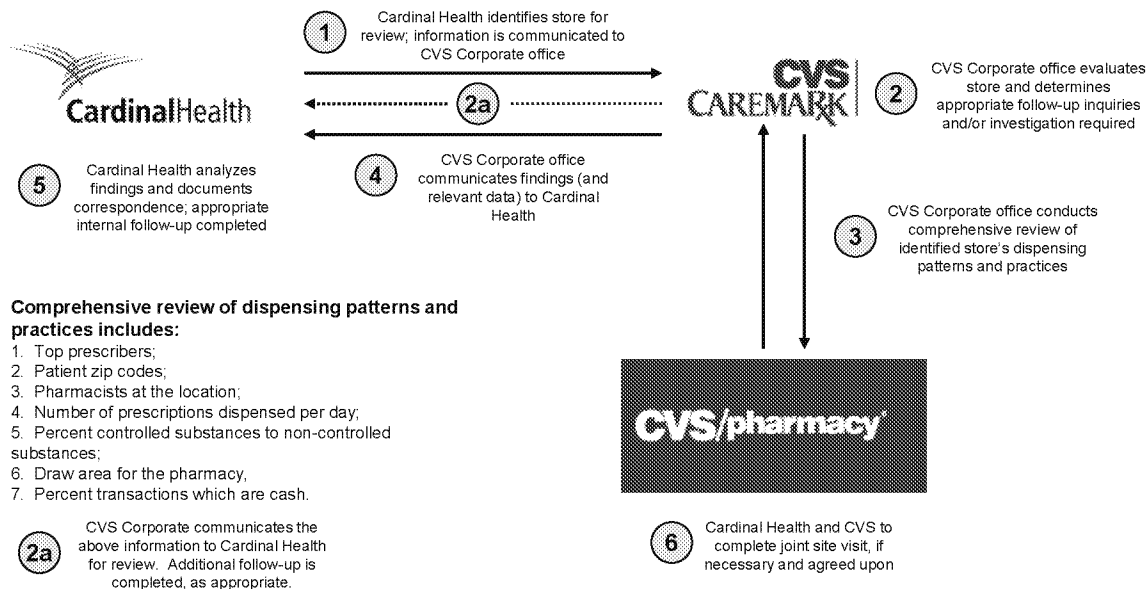
- When a store's accrual exceeds the corresponding threshold limit, the order is held and routed to Corporate Quality & Regulatory Affairs (QRA) for review.
- When an order is held (i.e. threshold event), Cardinal Health can process the held order one of two ways.

| Additional information is provided | Additional information is NOT provided |
|---|---|
| Obtain additional information from CVS and complete a detailed review. At the conclusion of the review, if appropriate, the order will be released and shipped to the CVS store. Depending on the set of circumstances, and data provided, the threshold limit may be adjusted as well. | Cut (not ship) the order and report to the DEA as suspicious. |

Additional information is to be provided within five business days upon request. The order will remain held during the aforementioned five business days. Generally, if additional information is not provided within five business days, the order will be cut and reported to the DEA as suspicious.

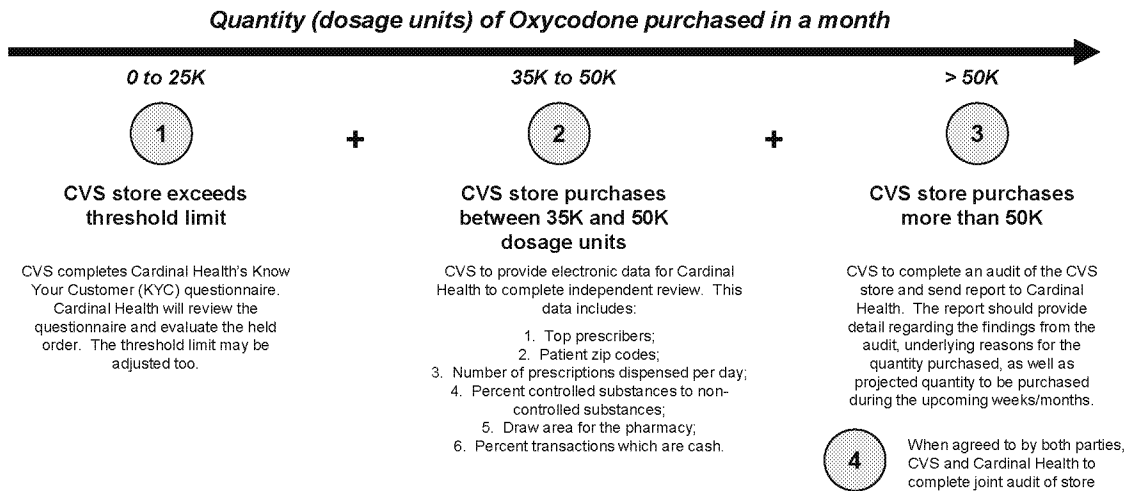
Communication Process

Execution of this process is time sensitive and must provide meaningful information.



CVS Store SOM Review Process

The depth of review required, and corresponding depth of data needed, increases in direct correlation to the quantity of Oxycodone purchased.



* There may be occasions where Cardinal Health will request additional data or ask additional questions. These instances will be scenario specific.

Confidential & Privileged: Joint Defense Information

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